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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF DEFENDANTS  
UBER TECHNOLOGIES, INC., RASIER,  
LLC, AND RASIER-CA, LLC'S OMNIBUS  
MOTIONS IN LIMINE**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

**DECLARATION OF LAURA VARTAIN HORN ISO DEFENDANTS' OMNIBUS MOTIONS IN  
LIMINE**

Case No. 3:23-md-03084-CRB (LJC)

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California  
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber  
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal  
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would  
6 competently testify to the facts contained herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of the JCCP Order re Parties’ Motions in  
8 Limine and Motions to Exclude Expert Opinions, dated August 29, 2025.

9 3. Attached as **Exhibit 2** is a true and correct copy of an article entitled “Uber shares personal  
10 rider information in sexual assault cases with a claims company without informing alleged victims,” dated  
11 October 4, 2019.

12 4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the Deposition Transcript  
13 of Kayla Whaling, dated February 28, 2025.

14 5. Attached as **Exhibit 4** is a true and correct copy of excerpts of the Deposition Transcript  
15 of Brooke Anderson, dated May 6, 2025.

16 6. Attached as **Exhibit 5** is a true and correct copy of excerpts of the Deposition Transcript  
17 of Andrew Hasbun, dated April 10, 2025.

18 7. Attached as **Exhibit 6** is a true and correct copy of excerpts of the Deposition Transcript  
19 of Valerie Shuping, dated April 17, 2025.

20 8. Attached as **Exhibit 7** is a true and correct copy of excerpts of the Deposition Transcript  
21 of Hannah Nilles, dated June 30, 2025.

22 9. Attached as **Exhibit 8** is a true and correct copy of excerpts of the Deposition Transcript  
23 of Jordan Burke, dated March 20, 2025.

24 10. Attached as **Exhibit 9** is a true and correct copy of the JCCP Order re Motion for Summary  
25 Judgment or, in the Alternative, Summary Adjudication, dated July 31, 2025.

26 11. Attached as **Exhibit 10** is a true and correct copy of excerpts of the Deposition Transcript  
27 of David Curtis Sawyer, dated October 23, 2025.

12. Attached as **Exhibit 11** is a true and correct copy of excerpts of the Deposition Transcript of Hassan Turay, dated July 23, 2025.

13. Attached as **Exhibit 12** is a true and correct copy of the bates stamped document UBER-MDL3084-BW-00012056.

14. Attached as **Exhibit 13** is a true and correct copy of the bates stamped document CHECKR000891 through 000893.

15. Attached as **Exhibit 14** is a true and correct copy of the bates stamped document CHECKR000894.

16. Attached as **Exhibit 15** is a true and correct copy of the bates stamped document CHECKR000742 through 000745.

17. Attached as **Exhibit 16** is a true and correct copy of excerpts of the Deposition Transcript of Hannah Nilles, dated August 7, 2025.

18. Attached as **Exhibit 17** is a true and correct copy of the bates stamped document UBER-MDL-3084-DFS00003702 through 00003703.

19. Attached as **Exhibit 18** is a true and correct copy of the bates stamped document UBER-MDL-3084-DFS00003687.

20. Attached as **Exhibit 19** is a true and correct copy of the bates stamped document UBER-MDL-3084-DFS00003705 through 00003706.

21. Attached as **Exhibit 20** is a true and correct copy of the bates stamped document UBER-MDL-3084-DFS00159669 through 00159671.

22. Attached as **Exhibit 21** is a true and correct copy of the bates stamped document UBER-MDL-3084-DFS00003707.

23. Attached as **Exhibit 22** is a true and correct copy of the bates stamped document UBER-MDL-3084-DFS00003690 through 00003691.

24. Attached as **Exhibit 23** is a true and correct copy of the bates stamped document UBER-MDL-3084-DFS00003711 through 00003716.

25. Attached as **Exhibit 24** is a true and correct copy of the bates stamped document UBER-MDL-3084-DFS00216657.

26. Attached as **Exhibit 25** is a true and correct copy of excerpts of the Deposition Transcript of Greg Brown, dated August 26, 2025.

27. Attached as **Exhibit 26** is a true and correct copy of the bates stamped document UBER-MDL-3084-DFS00159699 through 00159700.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on December 16, 2025, in San Francisco, California.

/s/ Laura Vartain Horn

Laura Vartain Horn